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Company*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, for the use  
and benefit of SUSTAINABLE MODULAR  
MANAGEMENT, INC., a Texas corporation,

Plaintiff,

vs.

JE DUNN CONSTRUCTION  
COMPANY; FEDERAL INSURANCE  
COMPANY; HARTFORD FIRE  
INSURANCE COMPANY; TRAVELERS  
CASUALTY AND SURETY COMPANY  
OF AMERICA; DOE Individuals I-X and  
ROE Entities I-X, inclusive,

Defendants.

Case No.: 2:20-cv-00790-JAD-NJK

Compl. Filed: May 1, 2020

**STIPULATION TO EXTEND  
ALL DEFENDANTS' TIME TO  
RESPOND TO COMPLAINT**

**(FIRST REQUEST)**

This Stipulation to Extend all Defendants' Time to Respond to Complaint is made  
by and between Plaintiff United States of America, for the use and benefit of Sustainable  
Modular Management, Inc. ("Plaintiff") and Defendant JE Dunn Construction Company  
("JE Dunn") through their respective counsel, in light of the following facts:

**RECITALS**

A. Plaintiff filed the Complaint ("Complaint") against JE Dunn on or about  
May 1, 2020.

B. JE Dunn was served with the Complaint on May 13, 2020.

1 C. JE Dunn's current deadline to respond to the Complaint is June 3, 2020.

2 D. Federal Insurance Company has not yet been served.

3 E. Hartford Fire Insurance Company was served with the Complaint on May  
4 13, 2020.

5 F. Hartford Fire Insurance Company current deadline to respond to the  
6 Complaint is June 3, 2020.

7 G. Travelers Casualty and Surety Company of America was served with the  
8 Complaint on May 13, 2020.

9 H. Travelers Casualty and Surety Company of America current deadline to  
10 respond to the Complaint is June 3, 2020.

11 I. The parties agreed that JE Dunn shall have until June 17, 2020, to respond  
12 to the Complaint in order to give JE Dunn time to investigate Plaintiff's claims and  
13 prepare a proper response. Additionally, the remaining defendants have, or are expected  
14 to, tender defense of these claims to JE Dunn and counsel for JE Dunn expects to  
15 represent all Defendants. The parties agreed that the additional time will allow  
16 Defendants to finalize these arrangements so that individual answers may not be required.

17 J. Accordingly, the parties further agree that the deadline for all Defendants  
18 to respond to the Complaint will be June 17, 2020.

19 K. There is good cause to grant this stipulation because JE Dunn requires  
20 additional time to investigate Plaintiff's claims, prepare a proper response on behalf of JE  
21 Dunn and the remaining Defendants.

22 L. This stipulation is filed in good faith and not intended to cause delay.

23 M. Pursuant to Local Rule IA 6-2, Plaintiff and JE Dunn respectfully request  
24 that the Court extend all Defendants' time to respond to Plaintiff's Complaint through  
25 June 17, 2020.

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**STIPULATION**

NOW, THEREFORE, Plaintiff and JE Dunn hereby stipulate and agree that JE Dunn and all Defendants have up to and including June 17, 2020, to file a response to Plaintiff's Complaint.

**IT IS SO STIPULATED.**

DATED this 3<sup>rd</sup> day of June, 2020.

DATED this 3<sup>rd</sup> day of June, 2020.

**MORRIS LAW GROUP**

**LEWIS ROCA ROTHGERBER  
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*Attorneys for Defendant  
JE Dunn Construction Company*

*Attorneys for Plaintiff*

**ORDER**

IT IS SO ORDERED.

  
\_\_\_\_\_  
United States Magistrate Judge

DATED June 4, 2020

3993 Howard Hughes Pkwy, Suite 600  
Las Vegas, NV 89169-5996

**Lewis Roca**  
ROTHGERBER CHRISTIE